

# **Exhibit S**

**Cangro, Bradford A.**

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**From:** Soskin, Peter E. <Peter.Soskin@klgates.com>  
**Sent:** Tuesday, January 08, 2019 9:38 PM  
**To:** MORGAN-only-uCloudlinkSIMO  
**Cc:** SIMO\_Skyroam  
**Subject:** SIMO v. uCloudlink - Proposal to File Second Amended Complaint

**FilingDate:** 1/9/2019 8:12:00 AM

[EXTERNAL EMAIL]

Counsel,

In addition to withdrawing the '735 Patent, SIMO intends to seek leave to file a Second Amended Complaint alleging willful infringement of the '689 as of at least August 20, 2018. uCloudlink knew or should have known of the '689 Patent based on its knowledge of the '735 Patent, and had actual knowledge of its infringement is based on the filing of SIMO's First Amended Complaint for Patent Infringement, which was filed on August 20, 2018. Furthermore, uCloudlink was willfully blind to the '689 patent by virtue of, for example, uCloudlink's knowledge of SIMO's technology through its employees that were formerly employees of SIMO. Despite its knowledge and/or willful blindness of the '689 Patent, uCloudlink has continued making, using, selling, and/or offering for sale in the United States and/or importing into the United States WiFi hotspot devices and mobile phones that practice or embody the asserted claims of the '689 Patent.

Additionally, given the forthcoming stipulation to dismiss, SIMO proposes amending the complaint to remove the '735 Patent.

Please let us know whether uCloudlink intends to oppose SIMO's motion to amend the complaint.

Regards,



**Peter Soskin**  
K&L Gates LLP  
4 Embarcadero Center  
Suite 1200  
San Francisco, CA 94111  
Phone: (415) 882-8046  
Fax: (415) 882-8220  
[peter.soskin@klgates.com](mailto:peter.soskin@klgates.com)  
[www.klgates.com](http://www.klgates.com)

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